

# **EXHIBIT**

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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
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*This document relates to:*

*Burnett, et al. v. Islamic Republic of Iran*, No. 15-cv-9903 (GBD)(SN)

**DECLARATION OF CHERYL D. COOPER**

I, CHERYL D. COOPER, hereby declare under penalty of perjury as follows:

1. I am currently 66 years old and reside in Staten Island, New York.
2. I was the domestic partner of Donald A. Foreman who was killed in the September 11, 2001 Terrorist attacks at the World Trade Center in New York, where he was police officer with the Port Authority of New York/New Jersey Police Department.
3. At the time of his death, Donald A. Foreman and I had been living together as husband and wife for sixteen years. We had been in an exclusive relationship for approximately 19 years.
4. At the time of his death, Donald A. Foreman and I lived with my two daughters in a home that we purchased together.
5. Prior to his death, Donald A. Foreman and I were raising my two daughters together. Donald treated my daughters as if they were his own children and my daughters considered him their father. When Donald A. Foreman and I began cohabitating, one of my daughters was four years of age and the other daughter was a new born. Donald A. Foreman was the father figure in my daughter's lives and he did all the things a loving father should do.

6. Following his death on September 11, 2001, I was the beneficiary of the proceeds of a life insurance policy insuring Donald A. Foreman's life.
7. Following his death on September 11, 2001, I was the beneficiary of the proceeds of pension assets and other investments made by Donald A. Foreman.
8. Shortly before his death on September 11, 2001, Donald A. Foreman and I began talking about marriage. It was our intention to be married by the end of 2001.
9. At the time of his death on September 11, 2001, Donald A. Foreman and I were very much in love and intended to spend the rest of our lives together. We had made plans to travel as a family, to watch my daughters grow into adulthood, and to enjoy our retirement years.
10. At the time of his death on September 11, 2001, Donald A. Foreman and I depended on each other for financial, spiritual and emotional support.
11. The September 11, 2001 terrorist attacks destroyed the life that Donald A. Foreman and I had been building together, and my life will never be the same after losing him.
12. At the time of his death, Donald A. Foreman was my spouse in all ways except in name.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 7-19-2019

Cheryl D. Cooper  
Cheryl D. Cooper